

April 12, 2022

VIA ECF

Honorable Arlene Rosario Lindsay
United States Magistrate Judge
United States District Court
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, New York 11722

Re: *Robert Goldblatt v. New York Institute of Technology,*
2:18-cv-00265 (DRH)(ARL)

Dear Judge Lindsay:

I represent Plaintiff, Robert Goldblatt, in connection with the above-referenced matter. I write this letter on behalf of both parties, and for the reasons set forth herein, respectfully, and reluctantly, request an additional brief request for an extension of time to complete discovery through May 15, 2022. As per the Court's most recent order discovery is to be completed by April 15, 2022. At the time of our last request for an extension, medical documentation pursuant to a HIPAA release was still outstanding as well as the completion of party depositions. The parties had scheduled Plaintiff's deposition for April 6, 2022. However, the medical documentation was not received until April 4, 2022, just days before the scheduled deposition thereby depriving the parties the opportunity to review the same in preparation for the deposition planned. The parties discussed rescheduling the depositions so that they would take place in advance of the April 15th deadline, however Plaintiff, who lives out of state, is unavailable on dates proposed. In addition, I am scheduled for a trial that is anticipated to commence on April 13, 2022. The parties have rescheduled Plaintiff's deposition for April 21, 2022, subject to the Court's granting of the herein request. This is the second request for extension made by Plaintiff on behalf of the parties.

Respectfully Submitted,

/S/
Gregory A. Tsonis